



ARKANSAS
Department of Environmental Quality

April 9, 2009

AECOM

Attn: Leslee J. Alexander, P.G.

Project Manager

10 Patewood Drive, Building VI, Suite 500

Greenville, South Carolina 29615

RE: Wormald Site Investigation Report for Cedar Chemical Company (March 30, 2009)
EPA ID Number ARD990660649; AFIN 54-00068

Dear Ms. Alexander:

The Arkansas Department of Environmental Quality – Hazardous Waste Division (ADEQ) has reviewed the Wormald Site Investigation Report (SIR) dated March 30, 2009. Based on ADEQ review, the following deficiencies and/or concerns have been noted:

- Table I – The sample results for TSB-1-a, TSB-3, TSB-4, and TSB-5 presented in Table I do not match the results in the laboratory report. Also, the results presented in this table for these same samples are presented with either a “J” or “JQ” flag. The laboratory report does not show any flags for these samples. Furthermore, the data validation report states the results for dinoseb by Method 8151A are acceptable and no data flags are required. Please address and correct these discrepancies.
- The Medium-Specific Screening Level of 680 mg/kg for dinoseb is incorrect. This value is taken from an outdated version of the Region 6 Medium-Specific Screening Tables and applies to an industrial outdoor worker with direct exposure to surface soil. The most current version of the Region 6 Medium-Specific Screening Tables is dated September 2008. In this case, the correct soil screening level for dinoseb is 0.051 mg/kg, which is a maximum contaminant level (MCL)-based screening level for protection of groundwater. All dinoseb concentrations collected from the 4’-8’ soil interval exceed this screening level. Laboratory analysis for the samples being held that were collected from the 8’- 12’ soil interval would provide additional information in regards to potential impacts to groundwater. Please amend the narrative accordingly.
- The statement in the conclusions that designates the dinoseb concentration of 13,000 mg/kg for 3SB-6 (4’-8’) in the 1996 FI as being erroneous is subjective. Several factors would cause variance in sample results. These would include, but not limited to, sampling methodologies, analytical procedures, exact duplication of sample locations, and infiltration over a 13 year period. In this case, years of infiltration and duplication of sample locations are likely to be two of the main reasons for differences in dinoseb concentrations from the two sampling events. Please note that concentrations of dinoseb vary throughout the site and will increase and decrease within the borehole. Samples

taken at shallow depths may exhibit lower concentrations of dinoseb. The range of dinoseb may increase as the hole advances and then decrease again at the base of the hole. ADEQ does not concur with the statement that the 1996 data is erroneous. There is not sufficient information available to qualify this statement. Please remove this statement from the final SIR and amend the narrative accordingly.

- The sample location map included with the SIR is the same map that was included with the workplan. The actual surveyed location of the sample collected for this investigation is not included in SIR. Please provide an updated map showing the surveyed location of each sampling location.

Please prepare a response to each of the items noted above and submit to ADEQ within fifteen (15) days of receipt of this letter. If you have any questions or need additional information, please feel free to contact Tammie J. Hynum of my staff at (501) 682-0856 or hynum@adeq.state.ar.us or myself at (501) 682-0831 or at benefield@adeq.state.ar.us.

Sincerely,



J. Ryan Benefield, P.E.
Acting Hazardous Waste Division Chief

cc: ~~Mark Hemingway~~, P.G., (Amec Consultants, Inc.; 5725 Hwy 290 West, Suite 200B, Austin, TX 78735)
~~Kelly Beck~~, P.G., (Amec Consultants, Inc.; 5725 Hwy 290 West, Suite 200B, Austin, TX 78735)
~~Dave Roberson~~ (DeMaximis, Inc. 2203 Timberloch Place, Suite 213 The Woodlands, TX 77380)
 Anne Weinstein, Attorney Specialist, ADEQ
 Dara Hall, Attorney Specialist, ADEQ
~~Allan Gates~~ (Mitchell Williams Selig Gates & Woodyard, PLLC, 425 West Capitol Avenue, Suite 1800, Little Rock, AR 72201-3525)
~~Joe Ghormley~~ (Quattlebaum, Grooms, Tull & Burrow, PLLC, 111 Center Street, Suite 1900, Little Rock, AR 72201)
~~Deborah D. Kuchler~~ (Abbott, Simeses & Kulcher, 400 Lafayette St. Suite 200, New Orleans, LA 70130)
~~Edward Brister~~ (Helena Chemical Co., 225 Schilling Blvd., Suite 300, Collierville, TN 38017)
~~Dan Burnham~~ (3225 Gallows Road, Suite 8B 0607, Fairfax, VA 22037)
~~Ann Faltz~~ (Attorney at Law, 585 Silverwood, North Little Rock, AR 72116)
~~David Hawkins~~ (General Counsel & Assistant Secretary, 225 Schilling Blvd., Suite 300, Collierville, TN 38017)
~~Kim Burke~~ (Taft, Stettinius & Hollister LLP, 425 Walnut Street, Suite 1800, Cincinnati, OH 45202-3957)
~~Mark Zuschek~~ (3225 Gallows Road, Suite 3D 2110, Fairfax, VA 22039)